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December 13, 2005

## B.B. Blevins

Executive Director  
California Energy Commission  
1516 Ninth Street, MS 39  
Sacramento, CA 95814

Dear Director,

On behalf of the North American Association of Food Equipment Manufacturers (NAFEM), we encourage the California Energy Commission to revise the definition of hot food holding cabinets in the California Title 20 Appliance Efficiency Regulations.

The standard definition is broadly written in such a way that it includes appliances that were not designed to meet the minimum standard of 40 watts/ft<sup>3</sup> and do not fit within the industry's definition of "hot food holding cabinets". While there is published data to support the elimination of hot food holding cabinets that do not meet the regulation (40 watts/ft<sup>3</sup>), there is no published data to support the same criteria for appliances such as heated glass merchandising cabinets, drawer warmers or cook-and-hold appliances. These appliances have a markedly different application in a commercial foodservice operation from a hot food holding cabinet.

Hot food holding cabinets are often used in the back of the house (cooking or kitchen area) for staging hot meals, while heated glass merchandising cabinets are typically used in the front of the house (customer area) to display and advertise available hot foods, such as hot dogs and pizza. These units would be unable to meet the energy consumption requirements without eliminating the glass sides customers need to inspect and select the hot product.

Drawer warmers have a variable volume, depending on the size of the pan used in the unit and the volume measurements used for hot food holding cabinets is not relevant to drawer warmers. Furthermore, there is a separate ASTM standard test method for drawer warmers (designation F2142).

Cook-and-hold appliances are designed primarily for cooking food, while holding cabinets are designed to keep cooked food warm. The energy requirements for a cooking appliance may be significantly higher than for an appliance designed simply to keep food warm.

To help clarify the regulation for the industry and avoid restricting critical appliances used to feed the public, we encourage the CEC to adopt the following definition:

**Hot food holding cabinet, n**—a heated, fully-enclosed compartment, with one or more solid or partial glass doors, that is designed to maintain the temperature of hot food that has been cooked in a separate appliance. Does not refer to heated glass merchandising cabinets, drawer warmers or cook-and-hold appliances.

- a. **heated glass merchandising cabinet**, *n*—an appliance with a heated cabinet constructed of glass or clear plastic doors which, with 70% or more clear area, is designed to display and maintain the temperature of hot food that has been cooked in a separate appliance.
- b. **drawer warmer**, *n*—an appliance that consists of one or more heated drawers and that is designed to hold hot food that has been cooked in a separate appliance at a specified temperature.
- c. **cook-and-hold appliance**, *n*—a multiple-mode appliance intended for cooking food that may be used to hold the temperature of the food that has been cooked in the same appliance.

If you have any questions regarding our recommendation, please contact me at 1.312.821.0212; [csouhrada@nafem.org](mailto:csouhrada@nafem.org).

Thank you very much for your consideration.

Sincerely,

Charlie Souhrada  
Director, Member Services  
NAFEM

Cc: *R. Cartwright*  
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